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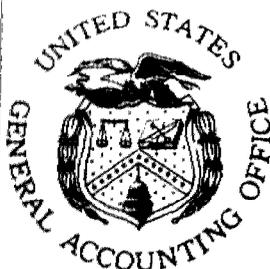
## Framework For Assessing Job Vulnerability To Ethical Problems

Because of the growing concern in the Congress and elsewhere over the amount of Government money lost each year through fraud and abuse, Federal agencies need to develop programs that aggressively implement standards of employee conduct and actively promote ethical behavior.

This study presents a framework for assessing a job's particular vulnerability to ethical or conflict-of-interest problems. The framework is based on a group of factors which agencies can use to better focus their programs for promoting employees' ethical conduct.



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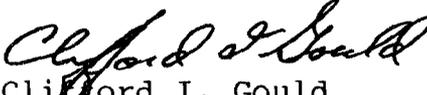
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## PREFACE

This staff study presents a framework for assessing job vulnerability to ethical or conflict-of-interest problems. The framework is based on a group of factors developed in conjunction with a panel of people having varied backgrounds in the ethics area.

We wish to acknowledge the cooperation and participation of the panelists who took time from busy careers to contribute to this study. (These panelists are recognized in app. III.) We also appreciate the invaluable assistance provided by Mr. Milton Goodman, Assistant Deputy Administrator for the Compliance Program of the Food Safety and Inspection Service, U.S. Department of Agriculture.

More testing of this particular framework is needed to establish its validity. However, the results of our test, presented in this study, seem encouraging and could be of use to managers in understanding the relationship of these factors to employee adherence to prescribed standards of conduct.

  
Clifford I. Gould  
Director



# C o n t e n t s

		<u>Page</u>
PREFACE		
CHAPTER		
1	INTRODUCTION	1
	Ethics laws and regulations	1
	Objective, scope, and methodology	3
2	A FRAMEWORK FOR ASSESSING JOB VULNERABILITY	7
	Constructing the framework	8
	Limited testing to evaluate jobs for relative vulnerability	9
	Observations	12
	Panelists' comments	12
APPENDIX		
I	Factors that can affect an employee's ethical conduct	16
II	Framework for a vulnerability assessment	22
III	Delphi exercise panelists	27



## CHAPTER 1

### INTRODUCTION

The maintenance of high ethical standards should be of utmost concern to all Federal employees. Revelations of employee misconduct damage the reputation of all Federal employees and undermine the public's confidence in Government's ability to do an honest, effective job.

There is growing concern in the Congress and elsewhere over the amount of Government money lost each year through fraud and abuse. We recently analyzed fraud cases covering a 2.5-year period from 1976 to 1979 and found that Federal employees were responsible for about 29 percent of the fraud cases. Individuals in non-Federal organizations were responsible for about 41 percent, and, in the remaining 30 percent of the cases, agencies were unable to identify which individuals were responsible. 1/

Although a statement of high ethical standards will not prevent all ethical abuses, we believe that most Federal employees will abide by established standards if agencies (1) apply standards consistently and equitably when questionable conduct is identified, (2) address situations which are meaningful to employees, and (3) keep employees aware of expected behavior. Agencies need to develop programs that aggressively implement standards of employee conduct and actively promote ethical behavior.

The purpose of this study is to present a framework in which a job's particular vulnerability to ethical or conflict-of-interest problems can be assessed. The framework is based on a group of factors which agencies can use to assess the strengths and weaknesses of their programs for promoting the ethical conduct of their employees.

### ETHICS LAWS AND REGULATIONS

The Federal Government has long had an interest in promoting high ethical standards for its employees. Criminal laws dealing with graft, corruption, and conflict of interest date back to the Civil War. During the administration of John F. Kennedy, the criminal conflict-of-interest laws were amended and codified as Chapter 11, Title 18, United States Code. In 1965, President Lyndon B. Johnson issued Executive Order 11222 directing agencies to establish standards of conduct for all Federal employees and requiring, for the first time, the reporting of financial interests. Executive Order 11222 established

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1/"Fraud In Government Programs:--How Extensive Is It?--How Can It Be Controlled? Volume I," AFMD-81-57, May 7, 1981.

- Government policy regarding an employee's ethical conduct;
- standards concerning the acceptance of gifts, entertainment, and favors;
- ethical standards of conduct and financial disclosure requirements for Special Government Employees; 1/ and
- financial disclosure requirements for regular full-time employees.

During the 1970's, the ethical conduct of Federal employees was again an issue of congressional and public attention. In 1974, at the request of various members of Congress, we began reviewing the effectiveness of Federal agency financial disclosure systems and programs for promoting ethical conduct on the part of all Federal employees. Since then, we have reported on over 20 financial disclosure systems, the laws and regulations governing certain activities of former Government employees, and Federal agency standards of employee conduct.

The high level of public and congressional interest in the ethical conduct of Federal officials resulted in the Ethics in Government Act of 1978. This act required, among other things, public financial disclosure on the part of high-level Government officials, set criteria for using blind trusts to avoid financial conflicts of interest, modified and increased restrictions on post-Federal employment activities, and established the Office of Government Ethics within the Office of Personnel Management.

The Office of Government Ethics has since issued regulations dealing with public financial disclosure, post-Federal employment, and the establishment of agency ethics programs. These regulations provide the legal and structural foundation for an ethics program. Regulations covering financial disclosure and post-Federal employment provide legal guidance in these two sensitive areas. The regulation governing the establishment of agency

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1/The term "Special Government Employee" is defined as an officer or employee of the Government who is retained, designated, appointed, or employed to perform, with or without compensation, temporary duties either on a full-time or intermittent basis for a period of not more than 130 days during any period of 365 consecutive days. The term, however, is limited to those persons who have an employee-employer relationship with the agency concerned.

ethics programs--5CFR Part 738--requires agencies to put a formal structure in place to administer an ethics program. This regulation establishes that the head of each agency has primary responsibility and shall exercise personal leadership in establishing, maintaining, and carrying out the agency's ethics program. The regulation requires that the head of an agency appoint a designated agency ethics official and formally delegate authority to coordinate and manage the ethics program.

In addition to requiring an organizational structure to administer an ethics program, this regulation (5CFR Part 738) specifies that designated agency ethics officials are to

- maintain an effective system for review and control of public and confidential financial disclosure statements;
- maintain a list of circumstances or situations that have resulted in noncompliance with ethics laws and regulations;
- develop an ethics education program;
- develop an ethics counseling program;
- take action to remedy noncompliance;
- evaluate the agency's standards of conduct, financial disclosure system, and post-Federal employment enforcement using information available from Inspector General or other audit or investigative activities; and
- refer matters to the Inspector General or other audit services as appropriate and accept referrals from that office.

OBJECTIVE, SCOPE, AND METHODOLOGY

Our objective was to determine what factors contribute to problems of ethical conduct within a job. These factors, once identified, could then be used by managers to develop specific standards to guide employees. These factors can also be used to identify those vulnerable aspects of a job which could be modified or eliminated. These factors could also alert agencies to areas needing increased inspection or audit coverage.

Recognizing the many unique situations agencies deal with, we realized that we could not review all positions within the Federal Government. Therefore, we sought to identify a list of factors which, when related to a particular job, could indicate the extent of vulnerability connected with the position.

We visited officials responsible for ethics programs in the following departments and agencies to obtain information about

their standards of employee conduct. These organizations were chosen as representative of the civilian Federal work force and as representative of a wide variety of jobs.

- Department of Agriculture  
Food Safety and Inspection Service 1/
- Department of Interior
- Department of Labor  
Employment Standards Administration  
Employment and Training Administration  
Mine Safety and Health Administration  
Occupational Safety and Health Administration
- Department of State
- Department of Transportation
- Department of Treasury

Many officials had ideas on what conditions contributed to the vulnerability of their employees, but these ideas had not been collected and disseminated to others. Further, officials were not in complete agreement as to what job factors contributed to the vulnerability of their employees. Therefore, we brought together a panel of people with knowledge and experience in dealing with ethical and conflict-of-interest problems in order to conduct a Delphi exercise to identify a comprehensive list of those factors thought to affect employee conduct.

#### The Delphi exercise

A Delphi exercise is a method for collecting and pooling knowledgeable judgments by structuring group communications to deal with a complex problem. A Delphi exercise usually undergoes four distinct phases. Phase one is an exploration of the subject wherein each individual contributes information that is felt to be pertinent to the issue. Phase two involves reaching an understanding of how the group views the issue, such as areas of agreement and disagreement. Significant disagreement is explored in phase three to bring out the underlying reasons for the differences and possibly to evaluate them. Phase four occurs when all previously gathered information has been initially analyzed and the evaluations have been fed back to the respondents for consideration.

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1/Formerly the Food Safety and Quality Service.

Delphi exercises have a number of properties which make them useful in a variety of situations involving the analysis of complex problems. The following properties led us to select a Delphi approach for this study.

--The task did not lend itself to precise analytical techniques, but could benefit from subjective judgments on a collective basis.

--Time and cost made frequent group meetings infeasible.

--The efficiency of a meeting could be increased by having had prior group interaction. 1/

Our first step was to identify a panel of experts on our subject. We were able to identify 50 knowledgeable persons representing diverse interests and backgrounds--Inspectors General, State auditors and controllers, law enforcement officials, attorneys, researchers, and academicians. These persons were invited to participate or to nominate other persons who they felt were qualified. Of the 50, 28 indicated a willingness to participate in the exercise.

The 28 participants 2/ in the first phase were asked to list the specific job factors they believed could contribute to an employee's vulnerability to unethical behavior; 23 participants completed this phase. From their responses, we identified 95 factors which seemed to be separate and distinct from each other.

For the second phase, we formulated the 95 factors into a questionnaire in which we asked the 23 respondents to indicate how important they believed each factor was in contributing to unethical behavior on the part of Government employees. The respondents evaluated each variable by checking one of the following: very important, important, moderately important, somewhat important, unimportant, and do not know. Respondents were also asked for narrative comments on the factors.

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1/Harold A. Linstone and Murray Turoff, "The Delphi Method: Techniques and Application" (Reading, Mass., Addison-Wesley Publishing Co., 1975) pp. 3 to 6.

2/Although the participants represented diverse backgrounds, they generally were senior level officials. As a result, the factors they identified may relate to positions under their authority. Other factors may exist which would be more applicable to senior level management.

We received responses from 22 participants. Using statistical techniques (a frequency distribution and a correlation analysis), we analyzed these responses and selected 66 factors listed by the group as important or moderately important. Because of the averaging techniques used, an overall rating of "very important" would have required a factor to be rated "very important" by all the participants. As a result no factor was rated "very important" overall. However, 32 factors were rated "important" overall. Since we wanted to assure that all significant factors were captured, we included an additional 34 factors which received an overall rating in the upper half of the "moderately important" range.

Using a correlation analysis, we further refined the data from 66 to 52 important factors. (Of the 66 factors, 14 were associated with others and we were able to combine them.) From the 52 factors, we identified 13 groups, each of which exhibited a distinctive theme. For ease of discussion, the 13 groups were categorized into (1) an organizational cluster (3 groups), (2) a job cluster (5 groups), (3) a managerial cluster (3 groups), and (4) a personal factors cluster (2 groups). (See app. I.)

We used the results of these analyses to prepare an issue paper which we sent to each participant in preparation for the third phase of the Delphi exercise, a face-to-face conference. Of the 22 participants who completed the second phase, 18 were able to attend the conference. The major objective of the conference was to explore the participants' reaction to our analysis. We used the conference participants' reactions and comments to modify the analysis, and to add to the information presented in this study.

We conducted the fourth round by mail by giving each of the 22 participants an opportunity to review the results of the study and to make suggestions and comments. We have incorporated these comments and suggestions as appropriate.

## CHAPTER 2

### A FRAMEWORK FOR ASSESSING JOB VULNERABILITY

Although our objective was to identify job factors which could indicate the extent of vulnerability to ethics and conflict-of-interest problems connected with a position, the participants in our Delphi exercise identified a large number of factors that related to facets other than a particular job. Appendix I lists 52 factors organized into those affecting the organization, job structure, management approach of an agency, and those related specifically to the person occupying a particular position. We believe that the data fit this particular categorization and that it was useful for further analysis. Other categorizations may have worked as well or better than the one we chose to use.

Using the factors listed in Appendix I, we constructed a framework of 12 job related factors and conducted a limited test of the framework at the Food Safety and Inspection Service of the Department of Agriculture. Our focus is not to imply that the other three areas are unimportant. We recognize that these areas can have a significant impact on vulnerability. We used the framework to evaluate the degree of potential risk inherent in selected jobs. The framework generally did discriminate among jobs in that those with a history of ethical problems were evaluated as having a higher degree of vulnerability than jobs for which there have been very few documented problems.

Although the preliminary results appear encouraging, more testing and use of the framework is needed to establish its validity. For instance, in our limited test the managers who reviewed jobs for relative vulnerability already knew which of the jobs had a history of ethical problems. This knowledge could have influenced the way they responded to the individual factors and, thus, could have influenced the ranking which indicated the relative vulnerability of the jobs. On the other hand, such familiarity with the jobs is a necessary ingredient for effectively using the framework, and we tried to lessen the impact of subjective evaluations through careful structuring of each factor so that each was as specific as possible. Application of the framework by line managers who have familiarity with the jobs but probably do not know the history of ethical problems may alleviate this bias.

Because the factors were chosen from our panel's work with the cooperation and advice of Service officials, they may have been too finely attuned to the Service's unique environment for universal application. To use the framework in another agency may require validating the factors and developing additional factors for the specific agency's situation.

## CONSTRUCTING THE FRAMEWORK

We constructed the framework for assessing the relative vulnerability of 10 jobs at the Food Safety and Inspection Service by selecting 11 separate factors which the panelists believed were important determinants of vulnerability associated with any job. With the advice of Food Safety and Inspection Service officials, we restated these factors to fit the situation at the Service and added a 12th factor which Service officials believed particularly relevant to their employees. The 12 factors were:

1. Employee has the power to directly and immediately influence economic benefits accruing to a private-sector firm or individual through inspecting, licensing, contracting, leasing, etc.
2. Employee performs the job independent of contact with supervisors and fellow workers.
3. Employee works at a private-sector firm's plant or offices.
4. Employee has a significant degree of discretion in making those decisions which form the substance of the job.
5. Employee must use subjective judgment in performing the job, which may make later verification of a decision difficult, if not impossible.
6. Employee can be expected to be personally familiar with clients.
7. Employee's pay is controlled or can be manipulated by a private-sector firm.
8. Employee is exposed to a situation where a private-sector firm being dealt with can provide attractive and desirable inducements such as higher paying jobs, status, prestige, convenience, friendship, etc.
9. Employee deals with private-sector firms whose normal business practices could be questioned if examined using standards applicable to the public sector.
10. Employee works in an environment where organizational and peer attitudes are permissive regarding strict adherence to prescribed standards of conduct.
11. Employee has not received instruction during the previous 36 months in the prescribed standards of conduct applicable to his position.

12. Employee has not received an orientation before assuming the duties of the current position from experienced practitioners as to what standard-of-conduct problems can be expected and practical advice as to how to handle them.

To assess the frequency with which these factors occurred in each of the selected jobs, we offered six possible responses: always; frequently, if not always; quite often; sometimes; once in a while; and never. For the results of the assessment to be valid, the framework must be used by someone with detailed program knowledge and actual experience. (The framework we used is included as app. II.)

LIMITED TESTING TO EVALUATE JOBS  
FOR RELATIVE VULNERABILITY

The Food Safety and Inspection Service employs more than 12,000 regular employees and licenses several thousand others to inspect, grade, and perform other duties related to insuring the quality and safety of food. Since the early 1970's, the Service has had three major incidents of employee corruption and several smaller incidents of standards violation. To combat these recurring problems, the Service formed a Program Integrity Task Force in 1979.

The task force reported that bribery, extortion, and acceptance of gratuities were of significant concern because of their potential for damaging program effectiveness and severely eroding public confidence in the safety and quality of foods. The task force emphasized the need for a highly visible, long-term program to deal with corruption issues in a positive, open, and coordinated manner. The task force recommended actions be taken to provide a

- firm commitment to maintaining the integrity of the Service's programs;
- high degree of awareness of what is expected from employees, supervisors, and the industries with which they deal;
- system of controls emphasizing a renewed role for managers and supervisors in promoting integrity; and
- means of continuing the work the task force had begun.

It was at the Service's invitation, and with its full cooperation, that we were able to test our framework. The Service was interested in our efforts because such a framework would help accomplish one of their task force's recommended actions; that is, to work with managers to assess corruption risks and critically analyze control and audit functions. Because the framework is

designed to be used by program managers, the actual assessment was made by the Acting Deputy Administrator for Compliance and by a compliance specialist. We provided them with general procedural guidance.

With the cooperation and advice of these 2 Service representatives, we selected 10 jobs for evaluation. The jobs represented a wide range of activities with differing histories of employee integrity. The 10 positions were then evaluated by each of the 2 representatives working independently. The results of their evaluations are shown below. When examining the results, the reader should keep in mind that the important aspect is the relative vulnerability of one job to another job, not the absolute vulnerability index resulting from one person's evaluation.

Evaluation of Relative Vulnerability

<u>Acting Deputy Administrator</u>		<u>Compliance Specialist</u>	
<u>Position</u>	<u>Index</u>	<u>Position</u>	<u>Index</u>
Food Inspector	43	Food Inspector	49
Circuit Supervisor	27	Circuit Supervisor	35
Regional Director	27	Compliance Officer	32
Area Supervisor	26	Area Supervisor	22
Compliance Officer	24	Officer in Charge	21
Officer in Charge	24	Regional Director	17
Deputy Administrator	20	Administrator	14
Administrator	19	Division Director	12
Division Director	18	Branch Chief	12
Branch Chief	18	Deputy Administrator	9

As can be seen, the most significant variations in the assessment of relative vulnerabilities were in the evaluation of the regional director and the deputy administrator positions. The compliance specialist told us that he had problems in evaluating these two positions because he was not as familiar with these jobs as he was with the others. In contrast, the acting deputy administrator was very familiar with these two jobs.

The framework is not meant to predict the behavior of persons occupying a specific job; however, one could expect problems to increase as opportunities for misconduct increase, if all else remains constant. The two highest rated positions above illustrate this point. Both officials evaluated food inspector as the most vulnerable position of the group, and in fact, the integrity record of the position indicates a high degree of vulnerability to ethical problems. We were told that over the last 10 years about 65 to 70 of the approximately 8,000 food inspectors have been criminally indicted and convicted while many others, although not criminally charged, have been involved in activities the Service considers unethical. The officials felt that a number

of inspectors regularly violate one or more of the standards of employee conduct. However, both officials emphasized that the primary purpose of having inspectors--to prevent unwholesome food from reaching the consumer--is being achieved.

Circuit supervisors, on the other hand, were ranked second by both officials although the group actually has an excellent integrity record. Service officials believed this seemingly incongruous situation could be due to the fact that circuit supervisors are (1) selected from the ranks of the best food inspectors, (2) required to catch problems--to overlook a problem would violate their role, and (3) not able to make or change quality decisions without the knowledge of one or more other Service employees. However, Service officials were cautious and warned of making judgments about the ethical behavior of any group based on records since records only indicate instances where misbehavior was uncovered.

The rating of food inspectors within our framework seems to highlight the twin problems of isolation and discretion. According to Service officials, it is not economically feasible to assign two food inspectors to every packing plant. Service officials indicated that training to increase personal motivation and identification with the Service and its codes could be beneficial.

Such a conclusion could lead to two possible actions. First, the Service could evaluate its code of conduct to assure the prohibitions and requirements of the code (1) support the inspector's role of keeping unwholesome food off the market and (2) are not arbitrary and unreasonable restrictions in view of the inspectors' duties. Secondly, the Service's approach to training could be analyzed and, if needed, modified so that it fosters the desired employee attitudes while still presenting the required technical information.

The above suggested actions represent one use that can be made of the framework--problem identification leading to program or procedural changes. In addition, identifying the specific causes for the vulnerability associated with a particular job could lead to restructuring the job to lessen its vulnerability. In this case, job restructuring was not viewed as a feasible alternative. Other possible actions resulting from the problem identification process could be a change in the incentive structure or reporting practices. Each of these tools can be used singly or in combination to improve the ethical environment. The important point is that a structured analysis such as that provided by this framework helps the manager to pinpoint the problem in specific terms. Thus a manager is more likely to choose a tool appropriate to the task.

## OBSERVATIONS

The establishment of the Office of Government Ethics and the issuance of regulations by that Office have provided agencies with the foundation for a standards of conduct program. In responding to the requirements established by the Office of Government Ethics, agencies need to consider the impact of all facets of an agency on ethical behavior. According to the Delphi panelists, the strength of an agency's ethics program can be affected by its organization, the way its jobs are structured, and its management philosophy. By considering all of these facets, an agency can identify areas of potential weakness and can take action to strengthen its program for promoting ethical behavior on the part of its employees.

In developing the framework, we concentrated on job factors because determining job vulnerability to ethical and conflict-of-interest problems was our major objective. Our use of the framework at the Food Safety and Inspection Service resulted in pointing out certain problems with the job of "food inspector".

We encourage designated agency ethics officials to take the lead in promoting the use of this sort of analytical framework. Although the framework we used may not be developed to a point at which it can be used universally to determine the degree of vulnerability inherent in particular jobs, the use of a list of factors such as this can be beneficial. Managers and those involved in an agency's monitoring and review functions should be aware of the factors we have identified and their potential impact on the ethical conduct of employees. Thus, we suggest that this information would be a useful addition to supervisory training programs. By analyzing these factors and assessing an agency's ethics program, managers, auditors, Inspectors General, and designated agency ethics officials can suggest changes that could improve the ethical conduct of employees. Where changes are not possible, managers will be more aware of the vulnerability associated with certain jobs and can provide additional oversight and guidance.

## PANELISTS' COMMENTS

Panelists commenting on this report generally felt that it fairly represented the results of the Delphi exercise and that it represented a first step in uncharted territory. Most felt that further testing and evaluation were needed to validate the instrument for wider use and/or to determine whether the existing framework can take into account variations among agencies. One panelist commented that the incongruent results with regard to circuit supervisors could suggest some problems related to the validity of the measurement instrument. This panelist believed

that, at the very least, the vulnerability ratings generated by the framework should not be taken strictly at face value, but should be analyzed in conjunction with other relevant data when readily available.

While we recognize that additional testing is needed, we wish to emphasize that our objective was to lay the groundwork for a new tool for dealing with ethical problems in Government, not to produce a fully validated instrument.

The panelists expressed concern about the section dealing with ethics laws and regulations. One suggestion was to expand this section to disclose how effectively agencies are implementing the provisions of the law. We agree that this information could be useful, but we did not include it because this type of information was not readily available and we did not believe it was crucial to an understanding of the study's subject matter. Since the primary focus of the report was the framework, an extensive discussion of the implementation of ethics laws and regulations could detract from the central theme of the report.

One panelist felt that the study was oriented too much toward upper management and that the report glosses over organization and management factors identified by the panel as problematic. In deemphasizing the organizational and management factors identified by the panel, we are not implying that these factors are unimportant. Our focus on job factors is due to our initial objective of examining characteristics of jobs in a more narrow context than the entire job environment. We agree that in many instances organizational and managerial factors can interact with job-related factors to heighten job vulnerability.

Another panelist expressed some reservation about the usefulness of the analytical framework in its present form. He suggested that the framework could be more valuable if the study (1) provided a review of the state-of-the-art in the field of "job vulnerability analysis" and analyzed the applicability of alternative approaches to standards of conduct matters or (2) applied the factors to classes of positions in a large number of agencies and compared the results to existing or desirable standards of conduct and financial disclosure requirements. We agree that both of the above suggested projects could provide valuable information and may be worth the investment of time that would be necessary to pursue them to a successful conclusion. However, we believe as was stated by another panelist that this study presents a useful first step in providing a baseline which may be used to further refine the job vulnerability assessment framework. As such, we believe it can be beneficial to agency managers in its current form.

This panelist also indicated that since the application of the framework requires a working knowledge of the positions under review, the usefulness is limited to specific situations in which line or program managers already have concluded they face a corruption problem. We agree that application of the framework requires a working knowledge of the positions under review, but disagree that it would only be useful in situations in which the line manager already knows a corruption problem exists. The framework presents factors which make a particular position vulnerable to unethical conduct. Use of the framework by a manager should enable the manager to identify potential problem areas whether or not actual problems have occurred. Prior knowledge of unethical activities is not necessary, in our opinion, for the framework to be valuable.

He further commented that the staff study should contain an explanation of the theory that underlies the vulnerability assessment project; that is, that resources devoted to compliance monitoring and enforcement of the executive branch standards of conduct should be concentrated on the incumbents of jobs characterized by the greatest vulnerability to being compromised or corrupted. While we did not include a discussion of the theory underlying our work, in our opinion, the theory implicit in any attempt to tailor or develop standards of conduct or rules of behavior is the concept that the standards or rules should be decided on the basis of situations which could possibly or probably occur and not on the basis of an overall criteria such as salary or grade level. We have taken this position in past work dealing with Federal agency financial disclosure systems and we believe that the establishment of standards based on the responsibilities of the employees involved is the approach agencies should take. We recognize, however, that the establishment of standards tailored to specific employee responsibilities can be a time consuming, difficult process requiring extensive further work on the part of those involved in ethics programs.

Another panelist suggested a reorganization of factors, definitions of the various major groupings, and greater specificity in the case of some factors. While we agree that other organizations of the factors could be useful and that greater specificity in defining some factors may be desirable, we believe that the development work has reached a point where it is sufficiently clear and understandable. Certainly, some benefit could be gained by fine-tuning the inventory of factors, but we do not feel that the resulting utility warrants further investment at this time.

One panelist noted that the next step after the assessment of vulnerability is to assess the probability that malfeasance will occur. The results of such a risk analysis could explain the seemingly inconsistent results with regard to the high relative vulnerability of circuit supervisors and the group's good

integrity record. For high risk situations, such as is likely for food inspectors, the third and final step would be to use a cost benefit analysis to examine alternative strategies for dealing with problems identified during the vulnerability analysis. Although we did not use a formal cost benefit analysis, such reasoning is the basis for the discussion of alternative ways for dealing with the vulnerability of food inspectors. (See p. 11.)

Another panelist informed us that he anticipates using some of the report material in a newly instituted Municipal Integrity Program. As part of this program, Sensitive Position Screening procedures have been adopted which the panelist believes "will benefit from this report." We are pleased to know that this material will be used even though it is still in a preliminary development stage.

FACTORS THAT CAN AFFECT AN EMPLOYEE'SETHICAL CONDUCT

The major groupings and subgroupings of the following 52 factors were determined by us based on comments supplied by the panelists and on our understanding of how each factor could affect an employee's ethical behavior. The factors listed are those that panelists indicated were "important" or in the upper half of the "moderately important" range.

ORGANIZATIONAL FACTORS

Policies and procedures can be ineffective in promoting ethical conduct.

1. Organization does not have effective sanctions for dealing with improper behavior.
2. Organization policy does not fix accountability for actions.
  - Written procedures are not distributed.
  - Written procedures are out-of-date.
3. Standards and statutes dealing with ethical behavior are unclear.
  - Lack of written standards of conduct.
  - Disciplinary policies are not clear, direct, and well known.
  - Written procedures are not detailed enough, leaving employees with significant amounts of discretion.
4. Lack of institutional protection for "whistle blowers."
5. Organization has a loosely drawn allotment system that puts pressure on administrators to expend monies especially when sizable amounts remain at the end of the period.
6. Policies and procedures do not preclude uncontrolled access to agency equipment or other public resources.
7. Constantly changing rules and regulations affect procedures and increase uncertainty.
8. Federal and State regulations have not been carefully translated into formal policies and concrete procedures.

Practices can be ineffective in preventing unethical conduct.

9. Too few resources are being provided for detection and prosecution of unethical conduct. For example, internal audit is weak or ineffective.

- Organization has experienced a rapid expansion of programs and services.
10. Oversight and independent review is sporadic.
  11. Agency practices are not written into policies and procedures, producing a highly personal, loose, and "no one really knows" environment.
  12. Performance appraisal system is not effective in that pay is not related to performance, but is related to seniority and a "don't make waves" attitude.  
--Employee compensation system does not reward ethical behavior.
  13. Ineffective screening of employee backgrounds.  
--Relevant employment criteria either is not codified or is not being followed. One result of such a situation could be nepotism.
  14. Practices exist which ignore written policies and procedures.
  15. Organizational power games are prevalent which become more important than work and result in secrecy, delay, distortion, suppression, censorship, leaks, red tape, gossip, getting even, ego tripping, etc.
  16. Organization line units have poor communication and cooperation with investigative agencies, internal auditors.
  17. Group or pluralistic decisionmaking for which no one individual is held accountable.
  18. Organization operates on a continual crisis basis. There is urgency or the appearance of it in decisionmaking.
  19. Career advancement for program managers is contingent on program success.
- Organization structure can hinder an effective ethics program.
20. Lack of adequate internal controls and review systems particularly with regard to separation of duties and responsibilities.
  21. Organization has decentralized management characterized by incomplete authorization and/or an inadequate reporting system.

22. Organization is remote. Lack of authorization and control which results in unclear goals and perceptions.

#### JOB FACTORS

The specific type of work can create an environment where unethical conduct is more likely.

23. Type of activity performed for work product, such as inspecting, licensing, authorizing, contracting, auditing, and investigating.
24. Work requires significant degrees of discretion.  
 --Employees work alone "on-site," isolated from government offices.  
 --Managers have broad discretion in decisionmaking.

How the work is performed can create an environment where unethical conduct is more likely.

25. Employee performs independently with little or no supervision, reporting, recordkeeping, or enforced standards of accountability. In some cases, this may cause a lack of job coverage, whereby only one employee knows the function of each job.  
 --No rotation or transfers of key employees.  
 --Rigid, hierarchical organization structure in which each job is a small fragment, and each employee functions without knowledge or understanding of the whole.

Ineffective ethics training can contribute to unethical behavior.

26. Lack of an adequate training program in standards of conduct (for example, no ethics training, ethics training not emphasized, absence of periodic training).

The source of employee remuneration can contribute to unethical behavior.

27. Employees are paid or reimbursed by industry contribution.
28. Private sector control of public employee rewards.  
 --Substandard pay scales or grade structure versus responsibility and power.  
 --Unequal pay and benefits for agency workers.

Pressures from inside and outside the organization can contribute to unethical behavior.

29. Existence of peer and hierarchical pressures to compromise personal standards and/or be successful.
30. Employees are exposed to fraud prone industry.
31. Because of the small size of community served, employee becomes personally familiar with clients.
32. Pressure (hostility or agreeability) from client group served.

#### MANAGERIAL FACTORS

Supervisory emphasis can adversely affect ethical behavior on the part of employees.

33. Management does not wholeheartedly support the audit function.
34. Supervisors do not provide employees adequate feedback on their performance vis a vis expectations, particularly with regard to high ethical conduct.
  - Lack of personal contact between supervisors and employees, with particular emphasis on written instructions. Staff has little or no opportunity to give input on feasibility or specifics.
  - Lack of employee identification with the mission and function of the organization, his/her role, and the roles of his/her co-workers and supervisors.
35. Organizational goal achievement becomes so paramount that it undercuts effective and responsible evaluation.
36. Supervisors do not clearly articulate performance expectations to employees.

Managers may not practice sound supervisory principles which not only affects the effectiveness of the organization but can also create an atmosphere where unethical behavior is more likely.

37. Favoritism whereby the dispensation of rewards and penalties are based on personalities.
  - Administration by anxiety or the use of intimidation tactics to manipulate employee performance and behavior.
  - Differences of opinion or dissent are labeled as disloyalty or opposition to policy, tending to alienate employees from the organization.
38. Weak leadership at operating levels.

39. Supervisory reliance on verbal communications which assumes that instructions, policies, procedures, etc., are heard, understood, remembered, and correctly followed.
40. Supervisory failure to stimulate enthusiasm and pride in the organization.

Managers may be either ill-equipped or unmotivated to deal with ethical problems.

41. Inadequate attention to high risk areas and deficient knowledge of types of corruption.
42. Lack of managerial motivation to deal with ethical issues.
43. Given peer pressure, lack of clear standards, and the uncertainty of punishment, it is easier to ignore the issues.
44. Supervisory failure to monitor employees who have degree of discretion involving lucrative transactions. In some cases, this failure may be attributable to personnel shortages.
45. Inadequate enforcement of codified policies/procedures and sanctions.
46. Supervisors are inadequately trained to detect unethical conduct.
47. Lack of systematic thinking and planning about ethical standards and issues on the part of Federal and State governments.

#### PERSONAL FACTORS

Employee desire for personal gain can contribute to unethical behavior.

48. Employees perceive that the rewards are greater from an unethical act than is the associated risk.  
--Pressures on employees from political sources.
49. Employee has personal interest in regulated industry (that is, owns stock or is related to management or employees).  
--Revolving door between industry and Government.  
--Employees work with an industry which devotes substantial financial resources to lobbying.
50. Personal drive to gain notoriety, power, income, etc.

Employee attitudes can contribute to unethical behavior.

51. Negative employee attitude and/or lack of commitment to the program.
  - Employees lack opportunities to participate in decision-making and creative planning, especially with respect to their own work.
  - Employees have little or no control over their own work.
  - Lack of ability and knowledge on the part of an employee.
52. Lack of identifiable philosophy about the public service ethic.

FRAMEWORK FOR A VULNERABILITY ASSESSMENT

This appendix presents the framework we developed to assess the relative vulnerabilities of jobs to ethical and conflict-of-interest problems at the Food Safety and Inspection Service of the Department of Agriculture. The specific factors were selected from those developed during this study but may be too finely attuned to conditions at the Service for universal application. Regardless of the specific factors chosen from the study, however, this framework is an example of only one of several possible approaches.

A Framework For Assessing Job  
Vulnerability To Ethical And  
Conflict-of-Interest Problems

This instrument is designed to assess the relative degree of risk or vulnerability associated with certain public service jobs. The 12 job-related factors comprising the assessment are those that a panel identified as being important in contributing to ethical and conflict-of-interest problems. The panel indicated that an employee's actual behavior in a specific situation is influenced by other variables such as the organization, its management, and employees' personal values.

The objectives of this vulnerability assessment are twofold. First and foremost, it is intended as a systematic way for a manager to evaluate the jobs under his purview and, thus, be sensitized to what conditions contribute to vulnerability. The second objective of the assessment is to compute a vulnerability index which expresses a relative degree of risk associated with specific positions. The absolute value of the index is not as important as is its use in comparing jobs for relative vulnerabilities. Indices such as these should be useful in allocating scarce management and auditing resources to those jobs most in need of attention.

Part I: Identification

Agency: \_\_\_\_\_

Job title: \_\_\_\_\_

Grade level: \_\_\_\_\_

Principal duties: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Geographic location: \_\_\_\_\_

Person making this evaluation:

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Part II: Job Evaluation

Consider the following factors in relation to a specific job and using your experience and judgment, choose the response which most closely describes your assessment of the situation. It is entirely probable and may be expected that similar jobs may have differing degrees of vulnerability associated with them depending on the local situation.

	Always	Frequently if not always	Quite often	Sometimes	Once in a while	Never
1. Employees have the power to directly and immediately influence economic benefits accruing to a private-sector firm or individual through inspecting, licensing, contracting, leasing, etc.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Always	Frequently if not always	Quite often	Sometimes	Once in a while	Never
2. Employee performs the job independent of contact with supervisors and fellow workers.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Employee works at a private-sector firm's plant or office.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Employee has a significant degree of discretion in making those decisions which form the substance of the job.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Employee must use subjective judgment in performing the job which may make later verification of a decision difficult, if not impossible.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Employee can be expected to be personally familiar with clients.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Employee pay is controlled or can be manipulated by a private-sector firm.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. Employee is exposed to a situation where a private-sector firm being dealt with can provide attractive and desirable inducements such as higher paying jobs, status, prestige, convenience, friendship, etc.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Always	Frequently if not always	Quite Often	Sometimes	Once in a while	Never
9. Employee deals with private-sector firms whose normal business practices could be questioned if examined using standards applicable to the public sector.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10. Employee works in an environment where organizational and peer attitudes are permissive, regarding strict adherence to prescribed standards of conduct.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

NOTE THAT SCALE IS REVERSED FOR QUESTIONS NUMBER 11 AND 12

	Never	Once in a while	Sometimes	Quite often	Frequently in not always	Always
11. Employee has received instruction in the prescribed standards of conduct, applicable to his position, during the previous 36 months.	<input type="checkbox"/>	<input type="checkbox"/>				
12. Employee has received an orientation from experienced practitioners, before assuming the duties of the current position, as to what standard of conduct problems can be expected and practical advice as to how to handle them.	<input type="checkbox"/>	<input type="checkbox"/>				

Part III: Index Computation

1. Count the check marks in each column and enter the total number in the indicated box:
2. Multiply the number in each of the above boxes by the indicated factor. Enter that total in the corresponding box.  5  4  3  2  1  0
3. Add the numbers in the above boxes and enter it below:

VULNERABILITY INDEX

DELPHI EXERCISE PANELISTS

This appendix presents biographical sketches of those persons who completed the Delphi exercise.

James S. Bowman - Associate Professor of Public Administration  
Florida State University

Dr. James S. Bowman was a National Association of Schools of Public Affairs and Administration faculty fellow from 1977 to 1979, in Washington, D.C. He has published articles on public policy and administration in numerous management and public administration journals. In 1981, he was a contributing editor of a special issue of Public Personnel Management on ethics in Government. He will also edit a symposium on civil service reform in Review of Public Administration during 1982. Dr. Bowman is a co-author of a forthcoming annotated bibliography on professional dissent in Government. He serves on the editorial board of the Southern Review of Public Administration and the Review of Public Personnel Administration. Recently selected by the W.K. Kellogg Foundation to participate in its 3-year national fellowship program, Professor Bowman is currently studying ethics in the professions.

J. Terrence Brunner - Executive Director, Better Government  
Association

Mr. J. Terrence Brunner's educational background includes political science and law. He has been admitted to practice before both State and Federal courts.

From 1965 to 1967, Mr. Brunner was the Assistant U.S. Attorney for the Northern District of Illinois, specializing in income tax violations. In 1967, he became Corporate Attorney for Johnson's Wax, and in December of that year, was appointed Corporation Counsel and Assistant District Attorney for Marathon County, Wausau, Wisconsin.

Mr. Brunner joined the Organized Crime and Racketeering Section of the U.S. Department of Justice in 1969 as a Special Attorney. In October 1970, he established the Pittsburgh Strike Force and directed major investigations of gambling, labor racketeering, police and municipal corruption, and fraud.

In September of 1971, Mr. Brunner was appointed as the executive director of the Better Government Association, an Illinois citizens' watchdog group. He has supervised investigations of a statewide chemical kickback scheme, the Illinois Saving and Loan Commission, the awarding of State Fair contracts, and \$91 million of waste in the City of Chicago budget.

Robert Ciolek - Executive Assistant to the Mayor of Cleveland, Ohio

Mr. Ciolek spent 1968 and 1969 as a Regular Army officer in Vietnam and was honorably discharged in 1970. He was awarded the Silver Star, Bronze Star, Army Commendation Medal, and Vietnamese Cross of Gallantry.

In 1973, Mr. Ciolek received his law degree and spent 2 years with a private law firm practicing criminal and administrative law.

Mr. Ciolek served as Massachusetts Deputy State Auditor from 1975 to 1981. His responsibilities included coordinating various audit investigations with law enforcement bodies such as the Attorney General and State Ethics Commission. He developed audit guidelines for fraud detection that led to several indictments and convictions. He also participated in several seminars on fraud, waste, and abuse. After completing the Delphi exercise, Mr. Ciolek became the executive assistant to the Mayor of Cleveland, Ohio.

Peter Cooley - Senior Consultant, Joint Legislative Audit Committee, California State Legislature

Mr. Peter Cooley's educational background includes degrees in anthropology and public affairs. He has held volunteer and staff positions with the Peace Corps, Neighborhood Youth Corps, and the Oregon Bureau of Governmental Research and Service and has served as a special consultant on oversight of State programs to the California State Legislature.

As the senior consultant on the California Joint Legislative Audit Committee, Mr. Cooley evaluates requests for audits and directs the fiscal and performance audits done by the Office of the Auditor General. The Committee responds to audit findings by holding oversight hearings and initiating legislative responses to the findings.

Herbert Edelhertz - Staff Scientist, Battelle Science and Government Study Center

Mr. Herbert Edelhertz's background includes degrees in political science and law. He spent the early portion of his career as a private attorney.

During the 1960s, he worked as Deputy Chief and then Chief of the Fraud Section, Criminal Division of the Department of Justice. In 1969, Mr. Edelhertz joined the Law Enforcement Assistance Administration as Acting Chief of the Center for Law and Justice.

From 1971 to 1980, Mr. Edelhertz established and served as research scientist and director of the Law and Justice Study Center of the Battelle Human Affairs Research Center in Seattle, Washington. He researched white-collar crime and related abuses and published extensively on white-collar crime and on compensating crime victims. Mr. Edelhertz has worked with the National District Attorneys Association and the Department of Justice to develop a national strategy for dealing with white-collar crime. In 1980, he transferred from Battelle's Law and Justice Study Center to Battelle's Science and Government Study Center.

Robert E. Hudak - Assistant Inspector General for Fraud Control and Management Operations, Department of Housing and Urban Development

Mr. Robert Hudak's educational background includes accounting, business administration, economics, and industrial management. He attended the University of Michigan's Executive Development Program in 1963 and in 1971, and has participated in the Federal Executive Institute-Senior Executive Education Program.

Since May 1979, Mr. Hudak has been the Department of Housing and Urban Development's Assistant Inspector General for Fraud Control and Management Operations. The previous 7 years were spent as an Assistant Inspector General for Washington Operations and Special Projects. Earlier, Mr. Hudak spent over 4 years in the Office of Audit and 11 years as an audit manager and assistant regional manager at GAO.

Part of Mr. Hudak's job is to coordinate audit and investigative activities within the Department. He has developed a number of innovative techniques for detecting and preventing fraud, such as fraud information bulletins and fraud indicators for use by both program people and audit investigators.

Nathaniel E. Kossack - Attorney with Perito, Duerk, Carlson & Pinco

Mr. Nathaniel E. Kossack, a Washington based attorney in private practice, represents District and county attorneys throughout the country.

Prior to going into private practice, Mr. Kossack was Inspector General of the Department of Agriculture, Deputy Assistant Attorney General of the Department of Justice's Criminal Division, and Chief of the Fraud Section at the Department of Justice.

Andrea G. Lange - Assistant Director, Washington Programs Office, University City Science Center

Ms. Andrea Lange holds degrees in the administration of justice and in political science. She has served as an Adjunct Faculty member in the School of Justice at American University. Prior to her work with the University City Science Center, she held managerial posts with the Commonwealth of Virginia, Division of Justice and Crime Prevention, and the firm of Arnold and Porter.

Ms. Lange has directed research and task force projects in such areas as fraud and abuse in Government benefit programs, white collar crime investigation and prosecution, food stamp fraud, judicial standards and goals, reorganization of State courts, and comprehensive multi-year criminal justice planning. She has familiarity with vulnerability analyses and investigative, administrative, and prosecutive enforcement at Federal, State, and local levels.

Ms. Lange has authored numerous books and articles on judicial and fraud and abuse subjects. She is the principal author of Fraud and Abuse in Government Benefit Programs and A Feasibility Study for Administrative Unification of Virginia's Judicial System Prepared for the Supreme Court of Appeals of Virginia.

Charles H. Levine - Edwin O. Stene Distinguished Professor of Public Administration, University of Kansas

Dr. Charles H. Levine has taught at Indiana University, Michigan State University, Syracuse University, and the University of Maryland where he was an associate professor from 1977 to 1981.

Dr. Levine has extensive consulting experience and has served on many advisory committees and editorial boards. He has been associated with numerous publications and professional papers. Some of his more recent publications and work in progress deal with organizational decline and cutback management.

In addition to participating in many public administration conferences, Dr. Levine has been a featured speaker and lecturer before various Government and university groups.

Robert D. L'Heureux - Special Assistant to the Inspector General, Small Business Administration

Mr. Robert L'Heureux holds a degree in English and is currently attending Georgetown University Law Center.

From 1964 to 1973, Mr. L'Heureux was a Marine Corps officer and served in Asia and Africa. From 1973 to 1979, he served as a Special Agent in the U.S. Naval Investigative Service. His duties involved investigations of crimes committed against the Department of the Navy and its personnel, and counterintelligence investigations and operations.

Since July 1979, Mr. L'Heureux has been Special Assistant to the Inspector General at the Small Business Administration. His duties involve performing policy and budget formulation, staff studies, and legislative reviews.

Bernard Lieberman - Professor, University of Pittsburgh

Dr. Bernard Lieberman holds degrees in psychology and social psychology. His post-doctoral work was spent in independent study of mathematics and mathematical behavioral science.

Dr. Lieberman has been a professor of sociology and psychology at the University of Pittsburgh for over 12 years. He spent 4 years there as an associate professor and 2 years at the State University of New York at Stony Brook as an assistant professor.

Dr. Lieberman has published several books and numerous articles and has presented papers at a variety of professional meetings. Included among his books are Social Choice and Contemporary Problems in Statistics. He is currently the associate editor of "The Journal of Mathematical Sociology" which he founded in 1971.

Theodore R. Lyman - Associate Director, Center for Public Policy Analysis, SRI International

Mr. Theodore Lyman of SRI International has been examining problems of fraud, waste, and abuse in Government since 1975. In 1978, he co-authored Decisions for Sale which describes problems concerning land use regulation solved at the local government level. He is currently working on a book on fraud prevention, describing tactics and procedures being used across the country. Another project he is beginning concerns fraud policy in Aid for Dependent Children, Medicaid, and Veterans Educational Benefits programs. Anticipated completion date for the project is late 1982.

Alfred O. Michaelangelo - Program Director, Office of Marine and Rail Programs, Office of the Inspector General, Department of Transportation

Mr. Alfred Michaelangelo's educational background includes accounting and management. He is a Certified Internal Auditor and a member of the Association of Government Accountants.

Currently, he is the Director of Marine and Rail Programs in the Department of Transportation. Mr. Michaelangelo has served as Chief of Regulatory Audits and Audit Chief, Office of the Inspector General, Federal Energy Administration. He was also an audit manager with the GAO and the Army Audit Agency.

Mr. Michaelangelo has been involved with the complete auditing cycle from planning and scheduling audits to writing and reviewing audit reports. He has been involved in a variety of program and management audits such as research, development and testing, logistical operations, automatic data processing, regulatory compliance, and medical care. While at the Federal Energy Administration, he worked on kickback schemes and pricing violations.

Jerome B. McKinney - Associate Professor, Graduate School of Public and International Affairs, University of Pittsburgh

Dr. Jerome McKinney, an Associate Professor at the University of Pittsburgh, has an academic background in the fields of public administration, constitutional law, comparative theory and government, political theory and methodology, economics, and accounting. He has been involved with questions concerning fraud, waste, and abuse over the last 3 years. In 1980, he organized a successful conference on the subject.

Dr. McKinney spent over 3 years auditing and developing programs for a State government prior to his work at the University of Pittsburgh. He is the author of numerous published articles and books in the area of public administration, accounting, and financial management.

Barry M. Mitnick - Associate Professor of Business Administration, Graduate School of Business, University of Pittsburgh

Dr. Barry Mitnick's educational background includes degrees in political science and physics. Dr. Mitnick has been with the University of Pittsburgh's Graduate School of Business since September 1978. During the previous 4 years, Dr. Mitnick taught public administration and political science at the Ohio State University. During 1973 and 1974, he was a Research Fellow at the Brookings Institution.

Dr. Mitnick's major research areas include models of incentive systems and organizations, and government regulation. He is the author of the Political Economy of Regulation: Creating, Designing, and Removing Regulatory Forms (New York: Columbia University Press, 1980) and of a number of articles in policy, management, and economic journals. Dr. Mitnick serves on the editorial board of the American Journal of Political Science.

Eileen Siedman - Deputy Inspector General--Community Services Administration

Ms. Eileen Siedman's educational background is in public administration. Before coming to Washington, D.C., in 1967, she worked for the Economic and Youth Opportunities Agency and for Los Angeles County government as an administrator and an analyst.

In 1969, she left the Center for Community Planning at the Department of Health, Education and Welfare to manage System Development Corporation's Washington Office for Health and Environmental Systems. She later held several positions at the Leadership Institute for Community Development where she directed special evaluation projects and trained Executive Directors of Community Action Agencies.

She has written books and numerous articles for the Public Administration Review, The Bureaucrat, and other professional journals. She has often been a speaker or panelist at conferences, workshops, and executive training seminars.

An active member of many civic and professional organizations, Ms. Siedman was a Vice-President of the National Capital Area Chapter of the American Society for Public Administration, organized the chapter's Committee for Women, and served as President of the Association for Public Program Analysis.

Lawrence Siegel - Systems Scientist, Mitre Corporation

Mr. Lawrence Siegel has been a social science analyst with the Mitre Corporation since 1974. Mr. Siegel has planned and evaluated a variety of Government-sponsored projects and programs. His major research responsibilities have included an assessment of crime and policing in urban mass transit systems for the Department of Justice, an assessment of the evolution and interface of criminal justice information systems, and an examination of computer-aided techniques to detect fraud and abuse in the Aid to Families with Dependent Children program.

Kent Stephens - Chairman, Sage Institute International

Dr. Kent Stephens holds degrees in organizational behavior, educational administration, mathematics, educational psychology, chemistry, geology, and education. For the past 8 years, while developing Sage Analysis, a technique for the quantification of human behavior, he has been a professor in the Department of Educational Administration at Brigham Young University. He is also the founder of the Sage Institute. Dr. Stephens is the original developer of the application of failure avoidance technology to the behavioral sciences and one of the original developers of Fault Tree Analysis.

Dr. Stephens' expertise in organizational behavior, development, and structure makes him a sought after speaker before national groups in the fields of business, industry, education, and Government. He has served as a consultant to organizations in each of these fields.

He is the author of a great many papers and articles on the subjects of organizational behavior, Fault Tree Analysis, and Sage Analysis. Currently, he is Chairman of the Alaska Futures Task Force for the Bureau of Land Management of the Department of the Interior; a Task Force Leader in the Futures Task Force, Region 6, of the Department of Agriculture; and a consultant to the Veteran's Administration for analytical studies in continuing medical education.

Eldon D. Taylor - Former Inspector General, National Aeronautics and Space Administration

Mr. Taylor spent 1960 to 1970 with the Space Administration planning and budgeting for space flight programs and directing a staff organization. He served as a member of an Office of Management and Budget Task Force to organize the Environmental Protection Agency and then as a Deputy Assistant Administrator in the new Agency from 1970 to 1973. Prior to 1979, Mr. Taylor spent 5 years as the Assistant Director for Administration at the National Science Foundation. He was appointed Inspector General for the Space Administration in 1979. His 30 years of public service in technical areas have given Mr. Taylor a background in dealing with conflict-of-interest problems unique to research and development activities.

Mr. Taylor has received the Space Administration's Exceptional Service Award in 1969, the Environmental Protection Agency's Special Achievement Award, and the National Science Foundation's Distinguished Service Award.

Danny R. Valdivia - City Auditor, Phoenix, Arizona

Mr. Valdivia is a Certified Internal Auditor who holds degree's in finance and business administration. He has completed the Massachusetts Institute of Technology, Sloan School of Management Program for Urban Executives. Mr. Valdivia's professional affiliations include the Municipal Finance Officers' Association and the Western Intergovernmental Audit Forum. He received the Association of Government Accountants' 1981 Distinguished Leadership Award for sustained outstanding leadership in governmental financial management and for establishing a municipal integrity program.

As City Auditor of Phoenix, Arizona, Mr. Valdivia's office has just completed a Code of Ethics for the city. His responsibilities include supervising audits of functions, programs,

Federal grants, and outside firms doing business with the city. Mr. Valdivia's office reviews and approves rate and fee schedules for city services, develops indirect cost allocation plans, and provides financial analysis staff services.

Mr. Valdivia serves as Chairman of the City Management Audit Control Committee, a "hot line" to receive allegations of fraud, waste, and abuse for the city to investigate. He is also Chairman of an ad hoc Task Force on Accountability and Integrity Maintenance System to evaluate what the city is doing to maintain municipal integrity and what can be done to improve the program. In addition, Mr. Valdivia is on the city's Background Review Team to investigate external promoters on major projects involving the city. As a result of his background with various integrity issues, Mr. Valdivia has represented the city in several seminars on fraud, waste, and abuse.

J. Jackson Walter - Director, Office of Government Ethics,  
Office of Personnel Management

Mr. Walter is a graduate of Amherst College and Yale Law School. He recently spent a summer at a Senior Managers in Government Program at Harvard University.

Mr. Walter worked for the State of Florida as the Assistant Secretary of the Department of Labor and Employment Security and as the Secretary of the Department of Business Regulation. He also spent 5 years as an attorney in private practice. In 1979, he was appointed the Director of the Office of Government Ethics.

The Office of Government Ethics is the executive branch office responsible for administration and implementation of the Ethics in Government Act of 1978. Among its duties, the Office has to issue an opinion concerning whether each of the Presidential nominees for Senate-confirmed positions is in compliance with conflict-of-interest statutes, such as financial disclosure requirements. In addition, by agreement with the Department of Justice, the Office has authority to render binding advisory opinions on all conflict-of-interest statutes.

Daniel S. Whittemore - Controller, State of Colorado

Mr. Whittemore holds degrees in accounting and law. He is a Certified Public Accountant and an attorney registered with the Colorado Supreme Court.

Prior to his service as Colorado State Controller, Mr. Whittemore was Assistant State Controller for over 5 years. He also spent a year as a partner in a small public accounting firm and almost 5 years as the World Church Controller for the Reorganized Church of Jesus Christ of Latter Day Saints.

Mr. Whittemore's primary interest and background is in accounting and internal control review, especially as it relates to conflict of interest. Active in several professional associations, Mr. Whittemore has received recent awards from the National Governor's Association and the Denver Federal Executive Board. He has spoken on "Consolidated Financial Statements for Government" before the Association of Government Accountants at various locations throughout the United States.

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